

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

August 23, 2022 at 10:00 a.m.

**NOTICE OF DEBTOR'S THIRD MOTION FOR ENTRY OF AN ORDER
PURSUANT TO 11 U.S.C. § 1121(d) EXTENDING THE EXCLUSIVE PERIODS TO
FILE A PLAN OF REORGANIZATION AND SOLICIT ACCEPTANCES THEREOF**

PLEASE TAKE NOTICE that, on August 23, 2022 at 10:00 a.m. (prevailing Eastern Time) or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the "Debtor") by and through its counsel, shall move before the

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to 11 U.S.C. § 1121(d), (a) extending the period during which the Debtor has the exclusive right to file a plan of reorganization to the first business day that is 30 days after the filing of the report regarding estimation of the Debtor's current and future talc claims by the Court-appointed expert (the "Exclusive Filing Period"); and (b) extending the period during which the Debtor has the exclusive right to solicit acceptances thereof for 60 days after the expiration of the Exclusive Filing Period (the "Motion").

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor's undersigned counsel, (b) counsel to the Official Committee of Talc Claimants, (c) the Future Talc Claimants Representative and her counsel, (d) the Office of the United States Trustee for the District of New Jersey, (e) the Fee Examiner and his counsel, and (f) any other party entitled to notice no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: August 2, 2022

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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